

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

STATE OF NEW MEXICO, *ex rel.*
State Engineer

Plaintiff,

vs.

ROMAN ARAGON, *et al.*,

Defendants.

69cv07941-MV/LFG

RIO CHAMA STREAM SYSTEM

Section 7
Jicarilla Apache Nation

JOINT MOTION FOR EXTENSION OF TIME

The Plaintiff State of New Mexico, *ex rel.* State Engineer, (State), Plaintiff-Intervener the United States of America (United States) and Defendant Jicarilla Apache Nation (Nation) respectfully request the Court to grant an extension of time to submit a proposed Consent Order to the Court describing the water rights of the Nation in Section 7 of the Rio Chama Stream System, as required by the *Order* filed July 2, 2012 (Doc. 10834), and in support state the following:

1. The July 2, 2012 *Order* requires the State, the United States and the Nation to submit a proposed Consent Order to the Court describing the water rights of the Nation in Section 7 by August 15, 2012.

2. The State has completed its review and compilation of the materials to be included as part of the proposed Consent Order and has forwarded the final version of the proposed Consent Order to the Jicarilla Apache Nation for its review and approval. The Jicarilla Apache Nation through its Legislative Council and its attorney have approved the Consent Order, and the materials have been forwarded to the United States for its review and approval. Counsel for the United States anticipates

that authorization of the proposed Consent Order by officials within the Department of the Interior and the Department of Justice will require at least another 60 days.

3. The State, the United States and the Nation request an extension of time until October 15, 2012 to complete this process and to submit a proposed Consent Order to the Court for approval.

Respectfully submitted,

/s/ Ed Newville
EDWARD G. NEWVILLE
Special Assistant Attorney General
Office of State Engineer
P.O. Box 25102
Santa Fe, NM 87504-5102
(505) 867-7444

telephonically approved 8/09/12
HERBERT A. BECKER
Attorney at Law
2309 Renard Place SE
Albuquerque, NM 87106
(505) 242-2214

telephonically approved 8/09/12
BRADLEY S. BRIDGEWATER
U.S. Department of Justice
South Terrace Suite 370
999 18th Street
Denver, CO 80202
(303) 844-1359

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 9th day of August, 2012, I filed the foregoing electronically through the CM/ECF system which caused the parties on the electronic service list, as more fully set forth in the Notice of Electronic Filing, to be served via electronic mail.

/s/ Ed Newville
EDWARD G. NEWVILLE